

EXHIBIT C

Page 1

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 Case No.: 1:19-cv-05434 (VM)

5 - - - - - x
6) STATE OF NEW YORK, STATE OF)
7) CALIFORNIA, STATE OF COLORADO,)
8) STATE OF CONNECTICUT, STATE OF)
9) COLUMBIA, STATE OF MARYLAND,)
10) STATE OF MICHIGAN, STATE OF)
11) MISSISSIPPI, COMMONWEALTH OF)
12) VIRGINIA, and STATE OF WISCONSIN)
13) Plaintiffs,)
14))
15) -against-)
16))
17) DEUTSCHE TELEKOM AG, T-MOBILE US)
18) INC., SPRINT CORPORATION and)
19) SOFTBANK GROUP CORP.,)
20) Defendants.)
21))
22) - - - - - x
23)
24)
25)

14
15 Friday, October 18, 2019
16 9:40:a.m.

17
18
19 VIDEO DEPOSITION OF HANNES WITTIG,
20 taken by Plaintiff State of New York, held at
21 Gibson, Dunn & Crutcher LLP, Telephone House
22 2-4, Temple Avenue, London EC4Y, United Kingdom
23 reported by Chanelle Malliff, Realtime Court
24 Reporter of the United Kingdom and Europe.
25

1 HANNES WITTIG

2 not. It's too long ago.

3 Q. Do you have a general recollection as to whether
4 you actively participated by sharing your viewpoint as
5 opposed to, for example, taking notes?

6 MR. SOVEN: Objection to form.

7 A. I frankly don't remember if I said anything but
8 I participated and normally when I participate in a meeting
9 I say something, but I can't specifically recollect
10 anything. It was a big group of people, so. And I wasn't
11 at the center of this workshop. I didn't organize it.
12 I didn't lead it. I didn't -- there were lots of people
13 with views in the room, so don't know. I actually don't
14 remember whether I said something or not.

15 BY MS. WESSELS-YEN:

16 Q. Who did organize the workshop?

17 A. It was hosted by our strategy group which is led
18 by Matthias Budde. He's on the e-mail here. And Steffen
19 Stern. Stern worked for him at the time. Part of
20 Matthias Budde's remit is that he is market forecasting, so
21 that's -- so I don't know the background to this, frankly,
22 specifically why Matthias Budde was asked to do this.

23 Q. Do you remember who led the workshop?

24 A. It was -- the moderator was Steffen Stern.

25 Q. Do you have any other information about what

1 HANNES WITTIG

2 Mr. Stern's role was with regard to the workshop?

3 A. Well, you asked with regard to the workshop. He
4 organized it and hosted it. I don't know what else he did
5 in this context. I was not involved in the preparation of
6 this document or in the -- so I was a guest in this event.

7 Q. And Mr. Stern also took and shared his notes as
8 well; correct?

9 A. I don't know. I could see here that I provided
10 some notes and you have also kindly provided me with some
11 notes from Mr. Stern but I don't -- so that's kind of what
12 I see. I don't recall more. It wasn't -- let's say from my
13 perspective this was not a consequential workshop, if I can
14 say it this way, so therefore I don't have a strong
15 recollection of it.

16 Q. If you could turn to slide 5 of the presentation.
17 That's the one that has, as a header, workshop participants
18 at a glance. If you could take a second to look at that.
19 Do you recall whether these people participated in the
20 workshop?

21 A. Well I know for sure that Thorsten Langheim did
22 not participate in the workshop I was in. But I remember
23 Peter Ewens, Matthias Budde and Steffen Stern. Volker,
24 sorry, I don't remember you.

25 Q. Again Dr. Stapper is here to observe alone. We